COURTNEY M. PRICE VICE PRESIDENT CHEMSTAR



December 10, 2003

OPPT CBIC

By Mail
Mike Leavitt, Administrator
U.S. EPA
P.O. Box 1473
Merrifield, VA 22116

Attn: Chemical Right-to-Know Program – Test Plan Submission from HERTG Registration Number

Dear Administrator Leavitt:

The American Chemistry Council Petroleum Additives Panel (Panel) Health, Environmental, and Regulatory Task Group (HERTG) submits for review and public comment its test plan as well as related robust summaries for Phenol, heptyl derivatives (CAS #72624-02-3) under the Environmental Protection Agency's High Production Volume (HPV) Chemical Challenge Program. The HERTG understands that there will be a 120-day review period for the test plan report and that all comments generated by or provided to EPA will be forwarded to the HERTG for consideration.

Thank you in advance for your attention to this matter. If you have any questions regarding the test plan report or the robust summaries, please contact Sarah Loftus McLallen at 703-741-5614 (telephone), 703-741-6091 (telefax) or Sarah McLallen@americanchemistry.com (e-mail).

Sincerely yours,

cc: HERTG Members